

Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

COLLEGE REPUBLICANS OF THE
UNIVERSITY OF WASHINGTON; and
CHEVY SWANSON, an Individual,

Plaintiffs,

v.

ANA MARI CAUCE, in her official capacity
as president of the University of Washington;
GERALD J. BALDASTY, in his official
capacity as provost and executive vice
president; RENE SINGLETON, individually
and in her official capacity as assistant director,
Student Activities; CHRISTINA COOP,
individually and in her official capacity as
senior activities advisor, Student Activities;
JOHN N. VINSON, individually and in his
official capacity as Chief of the University of
Washington, Seattle, Police Department;
CRAIG WILSON individually and in his
official capacity as University of Washington,
Seattle, Police Department Patrol Commander;
and DOES 1-25;

Defendants.

No. 2:18-CV-00189 MJP

DECLARATION OF SUSAN CARR

1 I, Susan Carr, state as follows:

2 1. I have served in law enforcement for more than 24 years. I joined the University
3 of Washington Police Department ("UWPD") in March 2011. For the past two years, I have
4 served as the Strategic Initiatives and External Relations Manager for UWPD. Previously, I
5 served as Technical Services Director for UWPD. I also worked as a dispatcher for 9 years,
6 where I gained experience using open source information to support personnel during
7 investigations and identify possible contact information for subjects involved in incidents. I hold
8 an M.S. in Law and Justice from Central Washington University and a B.A. in Liberal Arts,
9 Psychology, Sociology and Anthropology from Washington State University.
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11 2. In my role as UWPD Strategic Initiatives and External Relations Manager, I am
12 responsible for monitoring and researching open source information that is used by UWPD to
13 assess potential safety and security threats and assist in the development of appropriate security
14 plans for events on the University of Washington campus. I am frequently involved in UWPD's
15 security planning process for events held on campus, including events hosted by Registered
16 Student Organizations. I am familiar with and follow the Safety and Security Protocols for
17 Events Sponsored by Student Organizations.
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19 3. I use a variety of search tools and social media websites in researching an
20 upcoming event. As a starting point, search engines (Google), Wikipedia, YouTube, and news
21 aggregation websites allow me to quickly identify a wide range of potentially useful sources with
22 background information about speakers and other people and organizations involved in the
23 event, as well as recent news articles, reports, and videos from prior events. I click on sources
24 listed on Wikipedia pages for people and organizations associated with the event. I also search,
25 review, and monitor postings on social media websites, including Facebook, Twitter, Instagram,
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1 reddit, and Voat. At the beginning of my research, I identify key search terms such as the names
2 of the speakers and organizations putting on the event and the name of the event. As my
3 research progresses, I add search terms based on the results, such as hashtags associated with the
4 speakers, groups, or specific event. I look for multiple sources for the information I have
5 gathered and follow up on any gaps. I also continue to monitor “chatter” on social media about
6 the event. I assess and compile information from my research and provide a representative
7 sample of what I have found to UWPD officers, who use the information as appropriate to
8 inform their analysis of potential security threats and expected attendance at the event.
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10 4. Like UWPD, federal law enforcement and other police agencies rely on open
11 sources on the Internet to identify, assess, and respond to security threats. The Internet provides
12 an invaluable tool to efficiently and effectively gather a breadth and depth of information that
13 would otherwise not be feasible. In researching information from the Internet, I am mindful of
14 the wide range of reliability of sources. For example, when looking at websites, I take into
15 account how information is posted on the site, whether the information is fact-checked, and
16 potential biases of the source. Although I may be aware of the viewpoints held by a source on
17 the Internet, my methodology does not change based on the particular viewpoint of the source.
18 Social media postings should not always be taken as fact. However, social media can provide
19 real-time information about an upcoming event and is helpful in identifying who might be
20 attending the event and identifying potential security threats, as well as gauging the level of
21 interest in the event and finding other competing events occurring at the same time. Having
22 conducted hundreds of investigations into open sources on a wide range of topics, I have
23 developed unique experience and expertise in identifying trends and evaluating the reliability of
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1 sources. I provide information from a variety of sources to UYPD officers so that they can take
2 these into account any inconsistencies and contradictions in the information available online.

3 5. I learned in early January 2018 that the College Republicans of the University of
4 Washington were planning a Freedom Rally with Patriot Prayer on February 10, 2018, with
5 Patriot Prayer's founder, Joey Gibson, as the keynote speaker. In anticipation of this rally and
6 consistent with my ordinary practice as described above, I researched open source information to
7 help inform UYPD's security planning process. Among other things, I researched past events in
8 Seattle and the West Coast involving Gibson, Patriot Prayer, and its supporters and monitored
9 online "chatter" about the upcoming Freedom Rally. My initial search terms on Google,
10 Wikipedia, and social media websites included "Patriot Prayer," "Joey Gibson," and "College
11 Republicans." I also followed hashtags with the same terms (#PatriotPrayer, etc.). Over the
12 course of my research, I added additional terms including "Proud Boys," which I learned are
13 supporters of Patriot Prayer and regularly attend its events, as well as the names of counter-
14 protestors who attend Patriot Prayer events, such as Seattle Clinic Defense and Seattle Anti-
15 Fascist Action.

16 6. As I conducted my research for the Freedom Rally, I created a working research
17 document summarizing and compiling a representative sample of information from my research
18 and investigation for the Freedom Rally. The information and the links in the research document
19 are representative, not comprehensive of every website I visited. For example, for websites like
20 Wikipedia and Southern Poverty Law Center, I clicked through to review the sources of their
21 reports. I updated this document as I continued to monitor social media and follow-up on my
22 research.
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1 7. I emailed my working research document to Chief Vinson periodically in the
 2 week leading up to the Rally. Exhibit 1 is a true and correct copy of my email to Chief Vinson
 3 dated Thursday, February 10 at 4:06 p.m., with the research document that was attached to my
 4 email. This is the last time I emailed a copy of the document to Chief Vinson prior to the Rally.

5 8. My research revealed that at least 6 of the 15 events that Patriot Prayer hosted or
 6 protested in the prior six months resulted in violence and arrests.¹ Gibson, Patriot Prayer, and
 7 their supporters have a history of intentionally inciting and escalating violence with counter-
 8 protestors, who often attend at their rallies. My research also found reports and videos of known
 9 affiliates of Patriot Prayer carrying and using pepper spray and easily converted weapons such as
 10 flagpoles and bats that were used in the brawls that have erupted. In my research document, I
 11 highlighted information about these incidents in Yellow. For example:

12 a. At a September 10, 2017 Patriot Prayer rally in Vancouver,
 13 Washington, a Patriot Prayer supporter was apprehended after driving his truck in
 14 reverse at high speed into a crowd of counter-protestors. I watched a video of the
 15 incident, available at: https://www.youtube.com/watch?v=_0XCxdIUj6I (posted
 16 by the Oregonian). (Research Document, p. 4) After the protest moved from
 17 Vancouver to Portland, another truck reportedly carrying Proud Boys (known
 18 Patriot Prayer supporters) drove past the crowd while a passenger pepper-sprayed
 19 people in the crowd. The police stopped the truck but after letting it go without
 20 charge, the truck crashed into a police car. (Research Document, p. 10)

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 27 ¹ The tally on p. 1 of the research document does not include all of the events involving Patriot Prayer that I found over the course of my research. With the exception of the Planned Parenthood clash the morning before the Freedom Rally (described below), information about each event is included in the "Events" Section on pp. 3-7.

1 b. At a march for Kate Steinle in Portland, Oregon on December 9,
2 2017, a journalist with the Oregonian saw a Patriot Prayer affiliate cross the street
3 and strike a counter-protester, who suffered a bloody nose. The Patriot Prayer
4 affiliate was later taken into custody. The Portland Police Department reported
5 that Tusitala Toese, age 21, was being held in county jail on suspicion of second-
6 degree disorderly conduct, harassment, fourth-degree assault and a warrant for a
7 previous charge of second-degree disorderly conduct. Toese, who also goes by
8 the moniker "Tiny," is a spokesperson for Patriot Prayer. (Research Document,
9 pp. 4-5)

11 c. There were violent clashes at the weekly protests outside the
12 Planned Parenthood in Olympia on January 27, February 2, and February 9, the
13 day before the Freedom Rally. According to local police, weekly protests
14 between pro-life and pro-choice groups at the Olympia Planned Parenthood have
15 been mostly peaceful for years until January 27, when Gibson and two other
16 members of Patriot Prayer came to support the pro-life demonstrators. Gibson
17 was pepper sprayed in the face after, according to an unconfirmed report, he
18 lunged toward the crowd triggered by someone shining a flashlight into his eyes.
19 I informed Chief Vinson about the February 9 incident the day before the
20 Freedom Rally when accounts showed up online. The police reported one of the
21 protesters hit someone in the back of the head with some kind of weapon.
22 Another protester then got the weapon and hit the first protester in the face.
23 (Research Document, pp. 4, 8;
24 <http://www.theolympian.com/news/local/article199325699.html>)
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1 d. There was a scuffle between Patriot Prayer supporters and
2 opposition groups at the Support the American Flag in Salem, Oregon on October
3 10, 2017. (Research Document, p. 4)

4 9. My research of these prior events involving Patriot Prayer also revealed that
5 significant law enforcement presence and separation of participants from counter protestors
6 decreased the likelihood of violence. Where police took a “hands off” approach, fights were
7 instigated by both Patriot Prayer and Antifa protestors. (Research Document, pp. 1-2) For
8 example, at NW Stands Against Hilary on December 12, 2017, a significant police presence was
9 observed at the venue and there were no reports of violence. (Research Document, p. 5) At the
10 August 7, 2017 rally in Portland, there was no large scale deployment of police separating sides
11 and a number of brawls broke out. (Research Document, p. 3)

12 10. Through my investigation, I found that Proud Boys are supporters of Patriot
13 Prayer and often attend their rallies. Multiple news outlets and other sources reported that people
14 affiliated with the Proud Boys bring weapons to events, including guns.

15 11. In the week leading up to the event, there was a significant amount of online
16 chatter about the Freedom Rally on social media accounts of Patriot Prayer and its supporters
17 and opposition groups. In my experience, I have rarely seen the level and frequency of
18 threatening commentary on social media. There were multiple postings indicating that Proud
19 Boys and other supporters of Patriot Prayer planned to attend the event armed. By way of
20 example, I included screenshots from the Facebook pages of the College Republicans, Seattle
21 Anti-Fascist Action, and Anarchy Now. (Research Document, pp. 12-14, 17-19, 20-21)

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12. In advertising the Patriot Rally, the College Republicans invoked the shooting at the Milo Yiannopolis talk that they hosted, where a counter-protestor was shot and critically wounded outside Kane Hall where the talk was held. For example, the following banner appeared on their home page:



Photographs of flyers with the same slogan were posted on February 6, 2018, the Facebook page of an opposition group, Seattle Anti-Fascist Action. (Research Document, pp. 17-18)

13. I reviewed the following Summary of Seattle Police Department (SPD) Intelligence Brief, dated January 23, 2018: "College Republicans at UW have invited the Patriot Prayer group. Expect to see an increase in Patriot Prayer and Antifa participants as they will not be competing with any other events that day. There are no numbers available, so I'm expecting the total numbers to be less than 100. As the event draws closer, I think we may see some counter events pop up on social media." (Research Document, p. 1)

14. The week before the event, I participated in daily meetings with UWPD leadership. I reported on the information I had gathered described above. I also communicated regularly with Chief Vinson to keep him apprised of new developments.

1 I declare under penalty of perjury under the laws of the State of Washington that the
2 foregoing is true and correct to the best of my knowledge.

3 Dated this 26th day of March, 2018.

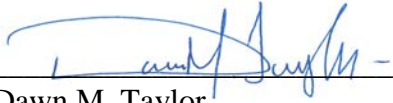


SUSAN CARR

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of March, 2018, I electronically filed the foregoing document with the Clerk of the United States District Court using the CM/ECF system which will send notification of such filing to all parties who are registered with the CM/ECF system.

DATED this 27th day of March, 2018.


Dawn M. Taylor